

Ashland Inc.

Richmond L. Williams
Chief Legal Environmental Counsel, Law

1313 N. Market Street Wilmington, DE 19894 Tel: 302-594-7020, Fax 302-654-7554 rlwilliams@ashland.com

October 7, 2011

VIA FEDERAL EXPRESS & VIA E-MAIL (Shade.Kevin@epamail.epa.gov)

Mr. Kevin Shade, Enforcement Officer Superfund Enforcement Assessment Section (6SF-TE) U.S. EPA, Region 6 1455 Ross Avenue Dallas, TX 75202-2733

RE: Gulfco Marine Maintenance Superfund Site, Freeport, Brazoria County, Texas

Dear Mr. Shade,

The following is in response to the 104(e) Request for Information ("RFI") from the United States Environmental Protection Agency ("EPA") directed to Ashland Oil, c/o Ashland Inc. ("Ashland") regarding the Gulfco Marine Maintenance Superfund Site, 906 Marlin Avenue (also referred to as County Road 756), Freeport, Texas (the "Site").

Pursuant to our discussions, you have agreed to allow Ashland to limit the scope of its response to information involving its current and former facilities that conducted business transactions with Gulfco Inc., Gulfco Marine Maintenance, Inc, Fish Engineering and Construction, Inc., Hercules Marine Services Corporation, LDL Coastal Limited L.P., and LDL Management LLC (the "Site Entities"), for the period January 1, 1971 through December 31, 1998 (the "Relevant Time Period")

In responding to the RFI, extensive efforts were made by Ashland to obtain and review all available current and archived corporate records known to exist at this time that may contain information responsive to this RFI for the Relevant Time Period which forty years into the past. Ashland's response was prepared from information gathered from available corporate records and publicly available information. Ashland supplemented that information by consulting with current and former employees with knowledge of Ashland's facilities during the Relevant Time Period. Ashland reserves its right to supplement its responses should additional information become available.

Pursuant to Ashland's Freedom of Information Act Request ("FOIA Request") to USEPA which sought, any and all information and documents relating to Ashland's purported nexus to the Site, USEPA produced the "PRP Site Nexus Reports" prepared by CR Consulting, Inc. on behalf of the Gulfco Restoration Group, dated November 5, 2009.

Only one document included with that report references Ashland — an invoice from Galveston Laboratories to Hercules Marine, dated July 12, 1994, seeking payment of \$225.00 for performing an inspection and atmospheric tests on Barge TPT 372 per certificate number 2199, also dated July 13, 1994 (see ASH00001). Included with this document was a certificate referencing Ashland Oil as the vessel owner or agent (see ASH00002.

Ashland acquired Thomas Petroleum Transit, Inc. ("TPT"), a marine transport company, on January 17, 1968 and it became a division of Ashland Oil, Inc. However, on March 3, 1993, Ashland sold the assets of TPT, including TPT's barges, to TPT Transportation Company, a wholly owned subsidiary of Dixie Carriers, Inc. ("TPT Dixie"). Since Ashland did not own any TPT barges in 1994, the invoice cannot relate to work on a TPT barge owned by Ashland. The most logical explanation is that there was that someone looked at out of date documentation for the barge at the time of performing the services. In addition, Ashland notes that the services in question were for an inspection and atmospheric tests on the barge, which does not necessarily imply that those services resulted in the disposal of hazardous substances at the Site. In the absence of information that suggests that Ashland engaged in other transactions with the Site entities Ashland concludes that it does not have responsibility under CERCLA at the Site. <sup>1</sup>

## **GENERAL OBJECTIONS**

Ashland fully incorporates by reference the foregoing general objections into each of its responses to the individual RFIs, and will therefore not restate such objections within all individual responses. Subject to, and without waiving or limiting the foregoing objections, Ashland responds to the RFI as follows.

1. Ashland objects to the RFI to the extent that it seeks information that is not in Ashland's possession, custody or control, nor could such information reasonably be expected to be available over a time period that span the Relevant Time Period. Subject to this objection, Ashland has reviewed information currently available to Ashland and relevant to the RFI. Ashland expressly states that its response to the RFI is limited by the current availability of information, and reserves the right to supplement, modify and/or amend its response if new or additional information becomes available. Additionally, Ashland does not routinely maintain documents or other information beyond timeframes specified

2

<sup>&</sup>lt;sup>1</sup> To further corroborate this conclusion, Ashland notes that it has been identified as a PRP at the Palmer Barge Site in Houston in connection with services provided to TPT barges by Palmer Barge while Ashland owned the TPT barges during the relevant time period.

in corporate records retention policies, or as otherwise required by law. Nevertheless, Ashland has undertaken a thorough investigation designed to identify available existing documents and/or other information in its possession, custody or control. Such available information forms the basis for Ashland's response.

- 2. Ashland objects to the RFI to the extent documents and/or information requested seek attorney/client communications, work product or any other documents or information protected from disclosure pursuant to any applicable privilege. Ashland specifically reserves all rights to assert legally recognized privileges to protect against the disclosure of information including, without limitation, the attorney-client privilege and the protection from disclosure pursuant to the work product doctrine. Ashland does not waive any such right or privilege by its response to the RFI, and hereby specifically asserts such privileges and protections as applicable. The inadvertent disclosure of privileged documents, or disclosure of documents labeled as privileged but initially deemed to be mislabeled, shall not waive any applicable privilege available to Ashland.
- 3. Based upon its review of the RFI, Ashland regards individual components of the RFI as vague or ambiguous. By way of example only, the RFI is vague or ambiguous to the extent that it does not define various terms or purports to define terms other than by their commonly understood meaning. Ashland specifically states that it has provided responses to the RFI based upon its understanding of the requests and the common usage of specific terms not otherwise defined.
- 4. Ashland further objects to the RFI to the extent that any individual request is overly broad and not reasonably calculated to lead to the revelation of relevant information pertinent to the Site, and/or that responding thereto would be unduly burdensome or expensive. In this respect, Ashland specifically objects to the RFI in that it purports to require detailed information for a time period spanning thirteen to forty years ago.
- 5. Ashland objects to the extent that the RFI, including the "Instructions" contained therein, purports to impose on Ashland obligations beyond those required under Section 104(e).

Nothing in this response is intended to waive, restrict or otherwise impair any arguments or defenses to CERCLA liability or otherwise, and Ashland hereby expressly preserves its right and ability to raise any and all such arguments and defenses.

# RESPONES TO REQUESTS FOR INFORMATION

1. Provide the legal name and mailing address of the Ashland.

## Response:

Ashland Inc. 50 E. RiverCenter Blvd. Covington, KY 41012 Ashland.com

2. Identify and provide the full name, title, business address, and business telephone number for each person answering these questions on behalf of the Ashland, and each person(s) that was relied on or consulted with in the preparation of the answer.

#### Response:

Richmond L. Williams
Chief Counsel, Environmental Litigation
Ashland Inc.
1313 N. Market Street
Wilmington, DE 19894
rlwilliams@ashland.com
302.594.7020

Mary A. Donahue Senior Environmental Paralegal Ashland Inc. 5200 Blazer Parkway Dublin, Ohio 43017 madonahue@ashland.com 614.790.3319

 If Ashland wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, and telephone number.

## Response:

Richmond L. Williams
Chief Counsel, Environmental Litigation
Ashland Inc.
1313 N. Market Street
Wilmington, DE 19894
rlwilliams@ashland.com
302.594.7020

Mary A. Donahue Senior Environmental Paralegal Ashland Inc. 5200 Blazer Parkway Dublin, Ohio 43017 madonahue@ashland.com 614.790.3319

4. Identify and include a brief description of the nature, timeframe(s) and status of the Ashland's business relationships with Gulfco Inc., Gulfco Marine Maintenance, Inc., Fish Engineering and Construction, Inc. Hercules Marine Services Corporation, LDL Coastal Limited L.P., LDL Management LLC, and any other previous or current owner or operator of the Site.

## Response:

Subject to and without any waiver of its objections, Ashland states that as of this date, after a diligent search and review of Ashland's records known to exist at this time, review of publicly available information, and consulting with current and former employees, it has not located any records or information that would suggest that Ashland had any business relationship with Gulfco Inc., Gulfco Marine Maintenance Inc., Fish Engineering and Construction, Inc., Hercules Marine Services corporation, LDL Coastal Limited L.P. or LDL Management LLC during the Relevant Time Period.

- 5. Identify all transactions with the Site owners and/or operators of the Site that resulted in materials being sent to the Site by you for any purpose, including but not limited to barge cleaning. Identify and provide all documents related to each transaction, including but not limited to invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
  - a. The type and purpose for the transaction;

#### Response:

See Ashland's response to Question No. 4.

b. A description of the materials involved, including their quantity and chemical content and characteristics;

### Response:

See Ashland's response to Question No. 4.

c. Any amounts paid by you in connection with each transaction;

#### Response:

See Ashland's response to Question No. 4.

d. The date of each transaction; and

#### Response:

See Ashland's response to Question No. 4.

e. The date the materials were sent to the Site.

### Response:

See Ashland's response to Question No. 4.

- 6. Identify all persons, including the Ashland, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials, hazardous materials, hazardous substances, and/or hazardous wastes (materials) from various facilities to the Site. This information shall identify and state, but not limited to the following:
  - a. The persons with whom the Ashland made such arrangements:

#### Response:

Subject to and without any waiver of its objections, Ashland states that as of this date, after a diligent search and review of Ashland's records known to exist at this time, review of publicly available information, and consulting with current and former employees, it has not located any records or information regarding any persons, including Ashland, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials, hazardous materials, hazardous substances, and/or hazardous waste (materials) at the Site.

b. The precise locations from which these materials originated;

#### Response:

See Ashland's response to Question No. 4.

c. The nature, including the chemical content, characteristics, physical state (e.g., solid or liquid) and quantity (e.g., volume or weight) of all materials involved in each such arrangement;

## Response:

See Ashland's response to Question No. 4.

d. All tests, analyses, analytical results, and manifests concerning each material involved in such transactions:

See Ashland's response to Question No. 4.

## Response:

e. The persons who selected the location to which the materials were to be disposed and/or treated. In particular, the persons who selected the Site as a location for disposal and/or treatment of the materials. This information shall include where these persons intended to have the materials involved in each arrangement treated or disposed and all evidence of their intent;

## Response:

See Ashland's response to Question No. 4.

f. The amount paid in connection with each such arrangement, the method of payment, and the identity of the persons involved in each payment transaction; and

#### Response:

See Ashland's response to Question No. 4.

g Provide contracts or other documents reflecting such arrangement for transportation, disposal, and/or treatment of materials.

#### Response:

See Ashland's response to Question No. 4.

7. Identify the corporate relationship(s) (such as successor by name change, successor by merger, etc.) between the named recipient of this request and its related entities as named at the time materials were sent by Ashland to the Site. Provide the corporate records which document that corporate relationship[s], including but not limited to documents related to mergers, acquisitions, sales, and assignments of liability.

# Response:

See Ashland's response to Question No. 4.

8. List all federal, state, and local permits, identification numbers, and/or registrations issued to the Ashland's operation for the storage, transport, and/or disposal of materials. Include respective permit numbers.

# Response:

See Ashland's response to Question No. 4.

 Provide names and addresses for all carriers who transported materials on behalf of Ashland to hazardous waste treatment, storage, or disposal facilities permitted by EPA or the State.

# Response:

See Ashland's response to Question No. 4.

- 10. Identify whether a Notification of Hazardous Waste Activity was ever filed with EPA or the corresponding agency or official of the State. This information shall include, but not be limited to the following:
  - a. The date of such filing;

#### Response:

See Ashland's response to Question No. 4.

b. The wastes described in such notice;

## Response:

See Ashland's response to Question No. 4.

c. The quantity of the wastes described in such notice; and

## Response:

See Ashland's response to Question No. 4.

d. The identification number assigned to such facility by EPA or the State.

# Response:

See Ashland's response to Question No. 4.

11. Identify all federal, state, and local offices and agencies to which Ashland has sent or filed hazardous substance or hazardous waste information and state the years during which such information was sent or filed.

# Response:

See Ashland's response to Question No. 4.

In replying to this RFI, Ashland has not, and shall not be deemed to have admitted any liability or responsibility with respect to the Site, the subject matter of the RFI or any other matter. If you have any questions concerning any response herein, please contact me.

Sincerely,

Richmond L. Williams

R.f. Wile.

Chief Counsel, Environmental Litigation

RLW/mad

**Enclosures** 

82199

PH. 409-762-3111 P.O. BOX 1031 GALVESTON, TX 77553

> كالمت 7/13/94

CUSTOMER OF DEH NO

P.O. #4318-89656

PFICE

SILESPENCE.

. 9%

HERCULES MARINE Drawer "O" Freeport TX 77541

JE-JulS

IC.

QUANTITY

1.59-

DESCRIPTION

INSPECTION AND ATMOSPHERIC TESTS ON BARGE TPT 372 PER CERT #82199 dtd 7/13/94:

RECEIVED

JUL 24 1994

HERCULES OFFSHORE MARINE DIVISION

\$225.00

AMQUN'I

There Burn

**HER 03033** 

••

stifuct the undersigned 🛂

QUALIFICATIONS: Transfer of belief or menipulation of valvos or abserve equipment tending to alter conditions in pipe lines, tanks or compared unbject to goe accumulation, unless aposifically approved in this Contificate, requires inspection and endorsement or release of Contificate appears on effected. All lines, weste, heating colle, valves, and similarly enciosed appertenences shall be considered "not exte" unit otherwise specifically designated.

STANDARD SAFETY DESIGNATIONS (paniel list, paraphrased from NFPA 306 Subsections 2-3.1 strough 2-3.5, and Subsection 6-3.2)

SAFE FOR WORKERS: Means that in the compartment or space so designated; (a) the oxygen content of the atmosphere is at least 19.5 percent by volume; and that, (b) touc materials in the atmosphere are within permissible concentrations; and that, (c) the residues are not capable of producing touc materials under existing atmosphere conditions while maintained as directed on the Marine Chemist's Certificate.

- composition of space so designated the requirements of Safe for Workers have not been met

THE COUNTY OF STANDS OF ST	1031 - GALVESTON TX 77553	409/762-3111			CERTIFICAL NO. F 821
Tod Acket  No. 7 (10 ye Hold The  No. 2 (avg. Tank  You Phis Wing The  No. 2 Fall Wing The  No. 2 Pall Wing The  No. 4 Pall Wing The  No. 4 Pall Wing The  No. 5 Pall Wing The  No. 6 Pall Wing The  No. 7 Pall Wing The  No. 6 Pall Wing The  No. 6 Pall Wing The  No. 7 Pall Wing The  No. 6 Pall Wing The  No. 6 Pall Wing The  No. 6 Pall Wing The  No. 7 Pall Wing The  No. 6 Pall Wing The  No. 7 Pall Wing The  No. 7 Pall Wing The  No. 7 Pall Wing The  No. 8 Pall Wing The  No. 8 Pall Wing The  No. 9 Pall Wing The  No. 10 Pall Wing T	17 FICICULES	Vessel Owner o	Agent Inc.	1/2	1-7-1
Tood Acket  No. 7 (10 by Hold Th)  No. 2 (aby Tank  You! PHS Wing Ths  No. 2 FAL Wing Ths  No. 4 PHS Wing Ths  No. 4 PHS Wing Ths  No. 5 PHS Wing Ths  No. 6 PHS Wing Ths  Phor Kake I	#	F Type of Ven	To XICIVE	illust 22 c	A. V. Spellin Location
No. 7 (any Fold The  No. 2 (any Tank  No. 3 (any Tank  No. 1 Pt Wing Ths  No. 2 Pt Wing Ths  No. 2 Pt Wing Ths  No. 4 Pt Wing Ths  No. 5 Pt Wing Ths  No. 6 Pt Wing Ths  Afer Kake I  No 6 Correct Vande Etward Cor Estimate  No 6 Correct Vande Etward Etward Cor Estimate  No 7 Correct Vande Etward Etward Cor Estimate  No 7 Correct Vande Etward Etward Correct  No 7 Correct Vande Etward Etward Etward Correct  No 7 Correct Vande Etward Et		Tests Parlin	ed .		Time Strvey C
No. T Cargo FLATIC  No. 2 Cargo FLANC  No. 3 Cargo Fank  No. 1 PT Wing Ths  No. 2 PT Wing Ths  No. 2 PT Wing Ths  No. 4 PTS Wing Ths  No. 5 PTS Wing Ths  No. 6 PTS Wing Ths  After Kake I  No. 6 Circ world Sor had work  No. 7 Circ world Sor had work  No. 8 Circ world Sor had world So					<del></del>
MD Z (ang Tank  NO.3 (ang Tank  NO.1 PHE Wing The   NO.2 FILL Wing The   NO.4 PHE Wing The   NO.5 PHE Wing The   NO.4 PHE Wing The   NO.4 PHE Wing The   NO.5 PHE Wing The   NO.5 PHE Wing The   NO.4 PHE Wing The   NO.5 PHE Wing The   NO.5 PHE Wing The   NO.6 PHE WING		7/17	<del></del> }		
Wo. 3 ('avg., 124k)  Wo. 1 P15 Wing Tks  NO. 2 P15 Wing Tks  NO. 4 P15 Wing Tks  NO. 4 P15 Wing Tks  NO. 5 P16 Wing Tks  NO. 6 P15 Wing Tks  NO. 6 P15 Wing Tks  No. 6 P15 Wing Tks  After Kake I  Word No. 6 Fire worth for hot work  No. 7 P16 Wing Tks  HER 03034			<del></del>	EF EC 2	H.C. P.F.F
No. 2 FAZ Wing TES ZHEK FOR MOT CUC NO. 2 FAZ Wing TES  NO. 4 PAS WING TES  NO. 5 PAZ WING TES  NO. 6 PAS WING TES  NO. 6 PAS WING TES  After Kake I  NO (, Use & firs worth for hat years  NO (, Use & firs worth for hat years  NO (, Use & firs worth for hat years  NO (, Use & firs worth for hat years  NO (, Use & firs worth for hat years  NO (, Use & firs worth for hat years  NO (, Use & firs worth for hat years  NO (, Use & firs worth for hat years  NO (, Use & firs worth for hat years  NO (, Use & firs worth for hat years  NO (, Use & firs worth for hat years  NO (, Use & firs worth for hat years  NO (, Use & firs worth for hat years  NO (, Use & firs worth for hat years  NO (, Use & firs worth for hat years  NO (, Use & firs worth for hat years)	1/2 (4)	Tauk	$\frac{1}{\sqrt{1 - \frac{\lambda^{n}}{n}}}$	IL FER	1000
No. 2 FAL Wing TES Y ZAFK FOR MOT COOP  No. 3 PAS Wing TES  No. 4 PAS Wing TES  No. 4 PAS Wing TES  No. 6 PAS Wing TES  After Kake		Way Tks	<del>-/:</del>		<del> </del>
No. 4 PIS Wing TES LELLONG (): 20.8  No. 5 PIS Wing TES  No. 6 PIS Wing TES  After Kake I  Jose Colon Control Control  Jose Conced Vends Editor Control  HER 03034			J = 111	K For	1107 W
No. 4 PHS LVING TKI  NO. 6 PHS WING TKI  NO. 6 PHS WING TKI  After Kake I  No. 6. Use a fire worth for hely work  No. 6 PHS WING TKI  HER 03034			1	,	
W. 5 PHE Wing TEI  NO.L PJS Wing TEI  After Kake I  Work of the fire worth for het work  We sorced youth between for internal to the property of the property		·····	LE	L: 0%	(1: 20.8
HER 03034			1	· · · · · · · · · · · · · · · · · · ·	<u>- • · · · · · · · · · · · · · · · · · · </u>
Not. Us & fire worth for hot years  We forced bends blick for his years  HER 03034	No.6 PJS	Wing TET	-		
HER 03034	A-Ger K	ake I			
HER 03034		<u></u>		7	
	450. Un Q-	ir wold,	er hoty	works	
	Vie Jers	ced You'r	5/100 -	or tuth	1)
		S <sub>0</sub> .			- V
					1
				······································	
		· · · · · · · · · · · · · · · · · · ·		· · · · · · · · · · · · · · · · · · ·	HER 03034
			Landa Andrea (1965) Programme and Andrea (1965)	at the commence of the commence of	
for the spaces of allegand. All those, vents, beating selle, velves, and similarly enciceed appurisonences shall be considered "not sale" uni-	GUALIFICATIONS: Transfer of ballact or manipul ments subject to gas assumed than, unless appear	inition of values or electric Manity approved in this Cor	equipment tending to Lifesto, requires insp	uiter conditions in pi action and endersom	po tince, tanks or comp ent or release of Cortific
	SAFE FOR WORKERS: Means that in the compertment or sp	oacu so denignate <i>d: (e)</i> the oxygen	content of the atmosphere	e at least 19.5 percent by v	olume; and that, (b) toxic main heric conditions while maintai
in the atmosphere are within permissible concentrations; and that, (c) the residues are not capable of producing toxic materials under existing atmospheric conditions while maintain	NOT SAFE FOR WORKERS: Nears that in the comparison				
SAFE FOR WORKERS: Means that in the compertment or space so designated: (e) the oxygen content of the atmosphere is at least 19.5 percent by volume; and that, (b) louis male in the atmosphere are white permissible concentrations; and that, (c) the residues are not depattle of producing tests; materials under examing atmospheric conditions while maintals distributed on the Marine Chamiet's Cartificate.  NOT SAFE FOR WORKERS: Means that in the compartment or space so designated, the requirements of Sate for Workers have not been met.	ENTER WITH RESTRICTIONS: Means that in any comparer	· -			
SAFE FOR WORKERS: Means that in the compertment or space so designated (e) the oxygen content of the stroughers as eleven 19.5 percent by volume; and that, (b) have made in the amoughers are within permissible concentrations; and that, (c) the residues are not capable of producing trade middles under existing atmospheric conditions while marks as directed on the feature Cohamiet's Carliflaces.  NOT SAFE FOR WORKERS: When a that in the compartment or space so designated, the requirements of Sate for Workers have not been met.  ENTER WITH RESTRICTIONS: Means that in any compartment or space so designated, early for work may be made only if conditions of proper protective equipment, clothing, time are as specified.				A-A-M-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-	
SAFE FOR WORKERS: Means that in the compertment or space so designated: (a) the oxygen content of the atmosphere is at least 19.5 percent by volume; and that, (b) touc materials and service on the Market contents permeable concentrations; and that, (c) the residues are not capable of producing touc materials under exacting atmospheric conditions while marks as directed on the Market Chemistr's Cartificate.  NOT SAFE FOR WORKERS: Means that in the compartment or space so designated, the requirements of Sate for Workers have not been met.  ENTER WITH RESTRICTIONS: Means that in any compartment or space so designated, early for work may be made only it conditions of proper protective equipment, clothing, time are as specified.  SAFE FOR HOT WORK: Means that in the compartment so designated; (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of inerted sool of where statemal not work is to be performed, and that, (b) the concentration of its atmosphere is below 10 percent of the lower flammable makes are not considered or concentration of the service resisting atmosphere is below 10 percent of the jown flammable makes are not considered or concentration for the atmosphere is below 10 percent of the lower flammable makes are not considered or concentration for the atmosphere is below 10 percent of the lower flammable makes are not considered or concentration that makes are not considered conditions; in the presence of the percent of the lower flammable makes are not considered to produce or the lower flammable makes are not considered to describe the makes the makes are not considered to produce of the lower flammable makes.	SAFE FOR HOT WORK. Means that at the compartment so of where adamnal hot work is to be performed; and that, (b) for the maidule are not causely of producings another concar.	the concentration of flammable n etration then permitted by (b) above	namenals in the atmosphere a under existing atmospher	ric conditions in the preser	ice of fire, and while maintains
SAFE FOR WORKERS: Means that in the compertment or space so designated: (a) the oxygen content of the stroughtens at least 19.5 percent by volume, and that, (b) he reactives are not capable of producing train-middles under outling atmospheric conditions while maintain as directed on the father occlumetr's Colombic and that, (c) the reactives are not capable of producing train-middles under outling atmospheric conditions while maintain as directed on the father of Colombic Col	SAFE FOR HOT WICHE. Means that on the competitivent so on their subsemal find work is to be performed; and that, (i) of the residence are not capable of producings leigher concentrated on the Assimal Chemistra Caraticase; and Justine; a subscanding to prevent the prevent of t	the concentration of flammable n niration then permitted by (b) above that, (d) all adjacent maces cont	nggeriels in the atmosphere a under existing atmospher wining or having contained	ric conditions in the preser I fammable or combusti	os of fre, and while maintaine de materials have been clea
SAFE FOR WORKERS: Means that in the compertment or space so designated* (e) the oxygen content of the strateghere are within permissible concentrations; and that, (c) the residues are not capable of producing trace mitted as under existing atmospheric conditions white maintains as directed on the Marine Chemistr's Calmarities.  NOT SAFE FOR WORKERS: Means that in the compertment or space so designated, the requirements of Safe for Workers have not been miss.  SAFE FOR HOT WORK. Means that in the compertment or space so designated, et any for work may be made only it conditions of proper protective equipment, clothing, then are as specified.  SAFE FOR HOT WORK. Means that in the compertment so designated (a) coppen content of the atmosphere is below 10 percent of the lower items of where sitems in the percentage of the proper protective equipment, clothing. SAFE FOR HOT WORK. Means that in the competition of intent side or where sitems in the percentage of the percentage of the lower items and of the percentage of the percentage of the lower items and of the lower items are not capable of producings inglifer concentration their percentage of the percentage of the lower items and in the strategy of the lower items and the percentage of the percentage of the lower items and the percentage of the percentage of the lower items and the maintaine directed on the Marine Chemist's Certificate, and white maintaine directed on the Marine Chemist's certificate, and before one substitution of the Marine Chemist's requirements.  NOT SAFE FOR REPAIR YARD EXTRY: Means that in the competitions of safe capable of producing that the the competitions and spaces of the farming the program is designated; (a) have been rest.	SAFE FOR HOT WICHE. Means that as the competitions so of where selected into work is to be performed; and that, (b) (b) the residence are not capable of producings higher concentrated on the Marine Chemist a Caraticase; and Author, it sufficiently to prevent the spread of fire, or are salesfactionly with the Marine Chemist's requirements.  HOT SAFE FOR HOT WORK: Means that in the competition SAFE FOR REPAIR YARD ENTRY: Means that the competitions.	is the concentration of flammable in intension then permitted by (b) above that, (d) all adjacent spaces continued, or, in the case of fuel tanks of tent so designated, the requirements and spaces of the flamma	nsseriels in the atmosphers a under existing atmospher spining or having containes r lube oil tanks, or engine ro nts of Safe for Hot Work he ble cryopenic figuid carrier	ric conditions in the preser of femmable or combusti on or fire room biges, has two not been met. so designased: (a) have b	oe of fire, and white maintaine ble materials have been clea wheen treated in accordance were tested by sampling at ren
SAFE FOR WORKERS: Means that in the compertment or space so designated: (e) the oxygen content of the standard here is 15.5 percent by volume; and that, (b) the reactives are not capable of producing train: miterials under available content by contents and that, (c) the reactives are not capable of producing train: miterials under available management.  NOT SAFE FOR WORKERS: Means that in the compartment or space so designated, the requirements of Sale for Workers have not been met.  ENTER WITH RESTRICTIONS: Means that in any compartment or space so designated, entry for work may be made only it conditions of proper protective equipment, clothing, time are as specified.  SAFE FOR HOT WORK. Means that in the compartment so designated (a) oxygen content of the atmosphere is a least 18.5 percent by volume, with the exception of inerted so or where several into the intent of the atmosphere is below 10 percent of the lower Rammable front and or where several producing a higher concentration of flammable materials in the atmosphere is below 10 percent of the lower Rammable front and (c) the reactures are not capable of producing a higher concentration then permitted by (b) above under existing atmospheric conditions in the presence of tire, and white maintaine directed on the Marine Chemist's Carefulate, and further, rise, (d) attriction containing a higher producing the producing a higher concentration of the atmosphere is below 10 percent of the lower Rammable front and conclusions on the Marine Chemist's a requirements.  NOT SAFE FOR NOT WORK: Means that the compartments and appears of the farmmable cryogene, figured carrier so designated. (a) have been reasoned the sampling stations, or results indicate the atmosphere is based to system, and test then 10 percent of the lower flammable limit, or (b) are instand to reasoned the limit or (b) are instand to the lower flammable limit, or (b) are instand to the lower flammable limit, or (b) are instand to lead to the lower flammable limit, or (b) are instand to lead to	SAFE FOR HOT WORK. Means that in the competitivent so of where sidemail not work is to be performed; and that, 6) (9) the residues are not capable of producings leighter concertienced on the Marine Chemist's Carsticate; and further, is sufficiently to prevent the spread of line, or are satisfactionly in the Marine Chemist's requirements.  MOT SAFE FOR HOT WORK: Means that in the competitive SAFE FOR REPAY VARIO ENTRY! Means that the competitive sampling stations, and results indicate the satisfactions results indicate the satisfactions results.	) the concentration of flammable in interaction the permissed by (b) above their, (d) all edjectril spaces continued, or, in the case of fuel tanks of earlier to see their sources of the flammatiments and appares of the flammatiment of their section of their secti	naterals in the atmosphere auther existing atmosphere atming or having corealises r lube oil tanks, or engine ro- mts oil Sale for Hot Work he ble cryogenic figuid carrier en, and less then 10 perciaces in the toragoing list at	vic conditions in the preser of flavorable combusti om or fire room bilges, has over not been met. so designated: (a) have b ont of the lower flavorable	ose of fire, and white maintaine ble materials have been clea when treated in accordance een lessed by sampling at ren limit, or (b) are inerted.
SAFE FOR WORKERS: Means that in the compertment or space an designated (a) the oxygen content of the stimosphere is at least 19.5 percent by volume; and that, (b) the reactives are not capable of producing train: mitted at under acutifing atmospheric conditions while maintain as directed on the flatates character Collections, and that, (c) the reactives are not capable of producing train: mitted at under acutifing atmospheric conditions while maintain as directed on the flatates (character) collections are specified.  NOT SAFE FOR WORKERS: Means that in the compartment or space so cleargnated, entry for work may be made only it conditions of proper protective equipment, clothing, then are as specified.  SAFE FOR HOT WORK Means that in the compartment or opecation of flatamable materials in the atmosphere is below 10 percent of the owner. As the secretion of inverted specified or where statemath not work is to be performed; and that, (b) the concentration of flatamable materials in the atmosphere is below 10 percent of the lower flatamable materials in the atmosphere is obtained to producing a higher concentration than permissed by (b) above under existing atmospheric conditions in the presence of tire, and white materials in the higher compartment in the Marine Chemistra Cambridaes; and flusher, rise, (d) attributes containing a higher dependent flower and white materials in the even clean sufficiently to prevent the spread of fire, or are sandscriptly merical, or, in the case of fuel familiary or higher it familiars, or engine room or fire room bitges, have been lessed by sampling at real recombination specified and accordance to Marine (all plants and accordance to Marine (all plants and accordance to Marine (all plants and accordance with a manipulation of the atmosphere is stead to be above 19.5 percent oxygen, and less than 10 percent of the lower flatamentation into (in (in) are invented or higher than 10 percent on the condition of each to be in accordance with its assigned designation. The General on th	SAFE FOR HOT WICHE. Means that as the competitions so convince and that (b) of where sistemal not work is to be participated and that (b) (c) he reactions are not capable of producings higher concentrations on the Marine Chemist a Carsticase, and Author. It sufficiently to prevent the spread of fire, or are satisfactionly with the Marine Chemist's requirements.  MOT SAFE FOR HOT WORK: Means that the competent SAFE FOR REPAIR VARIO ENTRY: Means that the competent sampling stations, and results indicate the atmosphere tests CHEMIST'S REQUIREMENT. This is to certify that in have a Vessels and here found the condition of each to be in according to the condition of each to be expected to the condition of the condition of each to be expected to the condition of the conditi	, the concentration of flammable in interaction that permissed by (b) above their, (d) all adjacent enterts continued to five families of sent of designated. The requirements and apaces of the flammatisd to be above 19.5 prevent oxyg personally determined that all spontance with its assigned designated course.	ngerents in the atmosphere author solding atmosphere gaining or having complete r lube bill tanks, or engine no ries of Safe for Hot Work he ble cryopenic figuid carrier en, and less then 10 perce aces in the foregoing list an lon. Geneticas is based on contain	ric conditions, in the present of deventable or combustion or fire room bilges. New year not been met. so designated: (a) have to tot of the lower flammable is in accordance with NFP or almost and the lower flammable is in accordance with NFP or almosting at the time the me of flushicutions and instruction.	los of fire, and white maintaine the materials have been cite to been treated an accordance seen lessed by sampling at ren limit, or (b) are inversed. A 306 Control of Gas Hezard section herein set loth was comp to: